

LIPSKY LOWE LLP
AN EMPLOYMENT LAW FIRM

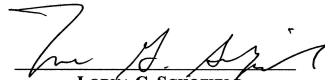
Alfons D'Auria

The application is GRANTED with modifications. The initial pretrial conference is adjourned to **April 15, 2021, at 10:50am**. The timing of the conference is approximate, but the Parties should be ready to proceed at that time. The conference will be held on the following conference line: (888) 363-4749, access code 558-3333. The Parties' joint letter and proposed case management plan are due by **April 8, 2021**.

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Dated: April 2, 2021
New York, NY


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

April 1, 2021

VIA ECF

The Honorable Lorna G. Schofield, U.S.D.J.
U.S. District Court for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Desrosiers v. Securitas Security Services USA, Inc.,
1:21-cv-00752 (LGS)

Dear Judge Schofield:

This firm represents the Plaintiff in this Fair Labor Standards Act and New York Labor Law matter. We submit this letter, on behalf of all parties, to respectfully request the April 8, 2021, 10:50 a.m., Initial Pretrial Conference be adjourned.

As background, since filing the January 27, 2021 Complaint, the parties have been in regular contact regarding the claims and defenses. Plaintiff has learned, through these discussions, the need to file a First Amended Complaint. Defendant, for its part, has consented to this request under Fed. R. Civ. P. 15(a)(2). Plaintiff intends to file the First Amended Complaint by April 14, making Defendant's responsive pleading due by May 5.

Given these developments, the parties request the April 8 Initial Conference be adjourned to a date after Defendant's responsive pleading is due. The parties propose that the teleconference be re-scheduled to May 11, May 12 or May 13. This conference was once before adjourned, from April 1 to April 8. This request, if granted, would not affect any other dates or deadlines, save for the deadlines for pre-conference submissions.



The Honorable Lorna G. Schofield

April 1, 2021

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We thank the Court for its attention to this matter, and remain available to provide any additional information.

Respectfully submitted,
LIPSKY LOWE LLP

s/ Alfons D'Auria
Alfons D'Auria

CC: All counsel of record (Via ECF)